State of Wisconsin
Governor Jim Doyle

TO: **Economic Support Supervisors**
        Economic Support Lead Workers
        Training Staff
        Child Care Coordinators
        W-2 Agencies
        Workforce Development Boards
        Job Center Leads and Managers

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BHCE/BWP OPERATIONS MEMO		
No: 04-64 Corrected 01/05/05		
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FS ☐ **MA** ☐ **SC** ☐		
CTS ☐ **CC** ☒ **W-2** ☒		
FSET ☐ **EA** ☐ **CF** ☐		
JAL ☐ **JC** ☐ **RAP** ☐		
WIA ☐ **WtW** ☐		
Other EP ☐★		
PRIORITY: HIGH		

SUBJECT: **W-2 and Child Care Program Eligibility Verification**

CROSS REFERENCE: Wis. Admin. Code Chapter DWD 18;
                         Income Maintenance (IM) Manual Chapter 1, Part C;
                         Wisconsin Works (W-2) Manual Chapter 4;
                         Operations Memos 98-82 and 02-11.

EFFECTIVE DATE: Immediately

PURPOSE

Clarification of policy on maintaining eligibility verification information in case records for
Wisconsin Works (W-2) and Child Care (CC).

BACKGROUND

As part of its 2002-03 Single Audit, the Legislative Audit Bureau (LAB) found that some W-2
agencies did not have adequate case file documentation for determining W-2 and CC program
eligibility. The Department of Workforce Development (DWD) agreed with the LAB findings and
indicated that it would remind W-2 agencies of case file documentation requirements.

As a long-term means of providing for consistent retention of and access to case file materials, DWD and DHFS are developing an Electronic Case File (ECF) system which will use document imaging (scanning) to store case file materials in an electronic format. As the ECF project proceeds toward implementation, and in order to ensure the effectiveness of ECF in maintaining comprehensive documentation, it is important that agencies administering the W-2 and CC subsidy programs understand and follow program policy with respect to the maintenance of case file information.

One area of particular importance is the maintenance of information used to verify participant program eligibility. Although the ECF represents a long-term strategy for ensuring consistent retention of eligibility verification information, at this point, it is vital that agencies review their case record practices to confirm compliance with program policy on eligibility verification.

POLICY

WHAT ELIGIBILITY INFORMATION MUST BE VERIFIED FOR W-2 AND CHILD CARE

The types of information that must be verified for eligibility for W-2 and CC and recorded in case records are enumerated in the following documents:

- Chapter DWD 18 of the Wisconsin Administrative Code
- Income Maintenance (IM) Manual Chapter 1, Part C, section 8.0.0, "Non-Financial Verification Items"
- IM Manual Chapter 1, Part C, Section 9.0.0, "Financial Verification Items"
- W-2 Manual Chapter 4, Section 4.1.0, "Record of Verification."
- Operations Memo 98-82

The following eligibility-related information must be verified for W-2 and CC:

- Identity and age
- Residence
- Citizenship/alien status
- Marital status
- Custody of child(ren) (verification not required for CC)
- Household composition
- Social Security number
- Work history (verification not required for CC)
- Employment status
- Income sources and amounts
- Assets (verification not required for CC)

HOW ELIGIBILITY INFORMATION MUST BE VERIFIED

W-2 and CC eligibility information requiring verification must be either "validated" or "documented." as detailed in IM Manual Chapter I, Part C, sections 1.1.0 and 1.2.0.

- *Validation* means placing an original item of verification evidence (or a copy thereof) in the case file.

- *Documentation* means describing the relevant verification evidence in a comment or document added to the case record based on observation, inspection, conversation, or collateral contacts.

Detailed information about what types of evidence that can be used to verify, either through validation or documentation, that a participant meets various eligibility criteria (including special rules for each criterion) can be found in IM Manual Chapter 1, Part C, sections 8.1.1 through 9.7.2.

Ensuring and Confirming Proper Verification
Whether verification is done through validation or documentation, a notation specifying what verification evidence was used, where any paper original or copy is filed, when the verification was performed, and who performed the verification should be entered in CARES case comments, as described in IM Manual Chapter 1, Part C, sections 1.1.0 and 1.2.0.

1. A verification code indicating that eligibility information has been verified should not be entered for an item without also noting the detail information in case comments.

2. Whenever making program eligibility determinations based on information pulled in from other program participation, workers should confirm verification by finding the relevant notation in CARES comments.

    - If a notation specifying how, when, and by whom a piece of eligibility information was verified cannot be found in CARES, that verification must be confirmed by consulting the case file. If the file contains the necessary eligibility verification information, the details of that information and the date it was inspected should be noted in CARES case comments.

    - If a notation specifying how, when and by whom a piece of eligibility information was verified cannot be found in CARES and if appropriate eligibility verification information cannot be found in the file, that eligibility item cannot be considered verified. Verification must be performed as prescribed in policy for that particular eligibility item, and the results noted in CARES case comments.

3. Although agencies must take steps to ensure all eligibility is verified to the extent necessary, previous policy guidance against over-verification still applies.

    - Verification should not be required if no such requirement is stated in program policy,
    - Additional verification should not be performed if acceptable verification has already been confirmed, and
    - A specific type of verification information should not be demanded if policy allows other information to be used.

CONTACTS

BHCE CARES Information & Problem Resolution Center

★Program Categories – FS – Food Stamps, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – Food Stamp Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WtW – Welfare to Work, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

DWD/DWS/BW-2/